

# READING & NORTHERN RAILROAD

*2002 Regional Railroad of the Year*

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December 11, 2003

Docket Clerk  
DOT Docket Management Facility  
Room PL-401 (Plaza Level)  
400 Seventh Street, SW  
Washington, DC 20590

Subject: Docket number FRA-2003-16271 - 4

Dear Docket Clerk:

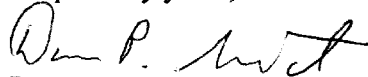
As specified in Part 211 of 49 CFR, this letter is in response to the petition for waiver filed by the American Shortline and Regional Railroad Association (ASLRRA) and posted in the Federal Register (Volume 68, Number 232) on December 3, 2003. In said petition the ASLRRA is seeking a waiver of compliance from the requirements of the Locomotive Safety Standards, 49 CFR part 229.23, which requires periodic inspection of all locomotives at intervals not to exceed ninety-two (92) days, and from the requirements 49 CFR 229.25, which identify items to be inspected during a periodic inspection.

The Reading Blue Mountain & Northern Railroad strongly supports the views expressed by the ASLRRA and feels that the benefits set forth under this petition for waiver should be made available to all regional and shortline railroads, not only those represented by ASLRRA. As a short line railroad that is not represented, the Reading Blue Mountain & Northern Railroad is hereby officially requesting to be included in this petition for a waiver of compliance.

We share the belief that short line and regional railroads do not operate their locomotive in the same environment as the larger Class I railroads. Class I railroads operate twenty-four hours a day, seven days a week, with longer and heavier trains, over greater distances than short line and regional railroads. The Reading Blue Mountain & Northern Railroad feels that the Locomotive Safety Standards periodic inspection and testing requirements should recognize this. If granted, we feel that regional and short line railroads should be allowed to perform the periodic, during required, annual inspections 49 CFR 229.27.

I can be contacted at (610) 562-2100 to address any questions you may have regarding this petition.

Respectfully yours,



Daren P. Geschwindt  
Manager of Operations Compliance  
Reading Blue Mountain & Northern Railroad

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DEPT OF TRANSPORTATION  
DOCKETS

*"The Reading & Northern Pacific"*

SERVING OUR CUSTOMERS AND THE ENVIRONMENT